

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK
CIVIC PARTICIPATION, MARY WINTER,
GENE STEINBERG, NANCY HART,
SARAH WOLFF, KAREN SLAVEN, KATE
KENNEDY, EDA DANIEL, and ANDREA
SFERES,

Plaintiffs,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC,
PROJECT 1599, and JOHN and JANE DOES
1-10,

Defendants.

Civil Action No. 20-cv-8668

DECLARATION OF SARAH WOLFF

SARAH WOLFF declares, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Sarah Wolff. I am over 18 years of age and am competent to make this declaration.
2. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
3. I am a U.S. citizen and lawfully registered to vote in New York County, New York, where I live.

4. On August 26, 2020, around late morning or midday, I received a robocall on my cordless landline phone, despite the fact that I am on the Do Not Call registry. I picked up and listened to the call live. The sender of the robocall was 703-795-5364. I know this because the number “703-795-5364” showed up on the caller ID on my phone. I recognized that this was a Virginia area code. I listened to the entire call and it did not provide a call back number.
5. When I picked up the robocall and heard a woman introduce herself as someone from Project 1599, I was puzzled. I had never heard of that organization before, and as a journalist, I am quite familiar with civil organizations across the country.
6. The call said it came from Jacob Wohl and Jack Burkman. I know who they are from media reports and my job as a journalist. The call alleged that bad things could happen if you vote by mail. It said your mail-in ballot could be used by the police or others to track you down or subject you to mandatory vaccines. I knew they were lying and trying to intimidate me.
7. As I listened to the rest of the call, I thought the false claims were ridiculous, but the effort taken to dissuade people from voting was infuriating.
8. While the call did not achieve its desired result with me, I do not believe I was the intended audience. I am white. The tone, topics, and language of the

call made me think it was being targeted at Black voters. The call appeared to use issues that are likely to resonate with Black Americans in order to scare them, like the threat of law enforcement attention or mandatory government medical programs. This scare tactic disgusted me, because I always vote in the general election and I think everyone should vote.

I declare under penalty of perjury that the foregoing statements are true and correct. Executed on:

October 14, 2020, in New York, New York, by

Sch Wolff

SARAH WOLFF